

FILED

DEC - 1 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. S1-4:21-CR-00593-JAR-SPM
)
BRUCE FRANKLIN, and)
KRISTIE MEEKS, a/k/a "Kristie Smith")
)
Defendants.)

MOTION TO SEAL

COMES NOW the United States of America, by and through the United States Attorney for the Eastern District of Missouri, Sayler A. Fleming, and Jason S. Dunkel, Assistant United States Attorney for said District, and states the following:

The Government hereby requests that this matter, S1-4:21-CR-00593-JAR-SPM, be sealed until the newly-added defendant, Bruce Franklin, can be brought into custody.

On December 1, 2021, the grand jury returned the first superseding indictment that charged two defendants with a total of 13 counts. There is one new defendant, Defendant Franklin, who has not previously been arrested or charged in this or a related case. He is charged with five Hobbs Act robberies, plus eight weapon offenses including brandishing firearms during each of those robberies. Franklin was in possession of three separate firearms in the course of the five robberies, and law enforcement has only been able to seize one of those firearms.

As grounds for its request that the indictment be sealed until the additional defendant is taken into custody, the Government states that due to the nature of the charges and Defendant Franklin's known access to firearms, there is an extreme danger to the arresting agents, officers, and to the community if the First Superseding Indictment were to become public prior to Defendant

Franklin's arrest.

WHEREFORE, the Government request that this matter be sealed until Defendant Franklin is taken into custody based upon arrest warrants issued in relation to the First Superseding Indictment.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Jason S. Dunkel

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